

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Pierrette V. Pearson a/k/a Pierrette V. Nix-Pearson

BK NO. 22-10803 ELF

Debtor(s)

Chapter 13

LSF9 Master Participation Trust

Movant

Hearing Date: 02/07/23

vs.

Pierrette V. Pearson a/k/a Pierrette V. Nix-Pearson
Respondent(s)

**OBJECTION OF LSF9 MASTER PARTICIPATION TRUST
TO CONFIRMATION OF CHAPTER 13 PLAN**

LSF9 Master Participation Trust (hereinafter Secured Creditor), objects to confirmation of Debtor's Chapter 13 plan and asserts in support of its Objection as follows:

1. On 10/19/2022 Secured Creditor filed a secured total debt proof of claim in the amount of \$148,201.30.
2. Debtor's Plan provides for payment in the amount of \$0.00 towards the arrearage claim of the Secured Creditor.
3. Debtor's Plan understates the amount of the Secured Creditor's claim by \$148,201.30, and does not provide sufficient funding to pay said claim including present value interest.
4. Accordingly, Debtor's Plan is not feasible, as it does not fully compensate the Secured Creditor.
5. In addition, the Debtor's Plan fails to comply with 11 U.S.C. §§ 1322 and 1325.

WHEREFORE, the Secured Creditor, LSF9 Master Participation Trust, prays that the Court deny confirmation of the Debtor's Plan.

Respectfully submitted,

Date: January 20, 2023

By: /s/ Brian Nicholas
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